

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No.
	:	
v.	:	18 U.S.C. §§ 1951 (a) and 2
	:	
RAMON ROSARIO	:	

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Attempted Extortion Under Color of Official Right

1. At all times relevant to this Information:
 - a. Defendant RAMON ROSARIO served as a member of the City Council of Atlantic City (the "City Council").
 - b. The City of Atlantic City, New Jersey, conducted business that affected interstate commerce.
 - c. An undercover FBI agent ("UC-1"), posed as a "Wall Street financier" and investor, who claimed to be involved in many interstate construction projects, and who was backing an Atlantic City area contractor ("Contractor-1") who was interested in obtaining development and construction work in Atlantic City.
 - d. The City Council was interested in developing a 6.4-acre waterfront site on the northeast inlet of Atlantic City commonly referred to as the Garwood Mills site, named for a department store that once occupied the land ("Garwood Mills").
 - e. Bader Field was Atlantic City's airport and was expected to be closed to

all air traffic when Atlantic City's agreement with the Federal Aviation Administration expired in or about September 2006. The closing of Bader Field would make available 190 undeveloped acres of prime real estate – the largest tract of undeveloped land in Atlantic City.

2. At various times in or about 2003, Contractor-1 told UC-1 that he had in the past and could in the future obtain Atlantic City development and construction projects by paying bribes to public officials.

3. In a consensually recorded meeting in Atlantic City on or about August 31, 2004, defendant RAMON ROSARIO accepted \$5,000 from UC-1, through Contractor-1. When defendant RAMON ROSARIO took the money, Contractor-1 stated, in substance and in part: "This \$5,000 is for helping us for all that you did. . . . This is to get you started." Also during this meeting, Contractor-1 said to defendant RAMON ROSARIO several times: "Just make sure we get Bader Field," to which defendant Ramon Rosario responded: "No problem." Defendant RAMON ROSARIO accepted the money in return for defendant ROSARIO's official support for Contractor-1 to become the general contractor or the construction manager on the Garwood Mills development and to obtain anticipated future development work at the Bader Field site.

3. On or about August 31, 2004, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

RAMON ROSARIO

did knowingly and willfully attempt to obstruct, delay and affect interstate commerce by extortion – that is, by accepting and agreeing to accept from UC -1 and Contractor-1 approximately \$5,000, in exchange for defendant RAMON ROSARIO'S agreement to exercise official action and influence to assist Contractor-1 relating to the development of Garwood Mills

and anticipated future development of Bader Field.

In violation of Title 18, United States Code, Sections 1951 (a) and 2.

CHRISTOPHER J. CHRISTIE
United States Attorney